

RE: MEGAN L LEONARD

) Case No. 19 B 16133
)
Debtor) Chapter 13
)
) Judge: JACQUELINE P COX

NOTICE OF MOTION

MEGAN L LEONARD

11154 S TROY ST
CHICAGO, IL 60655

DAVID M SIEGEL
via Clerk's ECF noticing procedures

Please take notice that on May 11, 2020 at 9:00 am my designee or I will appear before the Honorable Judge JACQUELINE P COX at 219 South Dearborn Courtroom 680, Chicago, IL and present the motion set forth below.

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail at 55 E Monroe St., Chicago, IL 60603 or by the methods indicated on April 24, 2020.

/s/ Tom Vaughn

TRUSTEE'S MOTION TO DISMISS FOR TERM OF PLAN

Now comes Tom Vaughn, Trustee in the above entitled case and moves the Court to dismiss this case in support thereof states:

1. On June 05, 2019 the Debtor filed a petition and plan under Chapter 13 of Title 11 U.S.C.
2. The debtor's plan was confirmed on August 26, 2019, for a period of 36 months.
3. The plan will complete in 65 months, from the date of confirmation.

WHEREFORE, the Trustee prays that this case be dismissed for material default by the debtor with respect to a term of a confirmed plan, pursuant to § 1322 (d) and § 1307 (c) (6).

Respectfully submitted,

TOM VAUGHN
CHAPTER 13 TRUSTEE
55 E. Monroe Street, Suite 3850
Chicago, IL 60603
(312) 294-5900

/s/ Tom Vaughn